

# Policy 1100

# Farm Direct Nutrition Program: Local

**Program Responsibilities** 

(Revised April 9, 2024)

#### **POLICY**

Participating local programs shall follow the procedures below to ensure program compliance with the Oregon Farm Direct Nutrition Program or "Farm Direct" (formerly the Oregon Farmers' Market Nutrition Program).

#### **PURPOSE**

To clarify the responsibilities of local programs regarding voucher issuance and security, participant education, documentation, monitoring requirements and follow-up on complaints and abuse issues.

#### **DEFINITION**

**Farm Direct Dollar**: public-facing name for Farm Direct voucher issued to participants.

### **RELEVANT REGULATIONS**

- ◆ CFR §248—Farmers' Market Nutrition Program
- ◆ Oregon Administrative Rules 333-053-0030 through 333-053-0110

#### **OREGON WIC PPM REFERENCES**

- ♦ 452—Civil Rights
- ♦ 460—Program Incentive Items
- ◆ 588—Program Integrity: Complaints
- ◆ 595—Program Integrity: Separation of Duties
- ♦ 840—Documentation for Nutrition-Focused Education and Counseling

#### **APPENDICES**

Page 1100.8	Appendix A	Instructions for completing Farm Direct voucher register
Page 1100.9	Appendix B	Replacement voucher procedure
Page 1110.10	Appendix C	Sample documentation of Farm Direct voucher inventory

#### **PROCEDURE**

### **Voucher Delivery to Local Agencies**

1.0 The state WIC program will coordinate the delivery of all Farm Direct vouchers and voucher registers to participating local programs.

- 1.1. Each participating local WIC program will be assigned a specific voucher number series by the state WIC office.
- 1.2. Farm Direct vouchers will be delivered by UPS or similar delivery service. The voucher delivery will have an enclosed packing list of the voucher number series sent to the program.
- 1.3. Initial physical inventory of vouchers must be completed by two staff members. Two staff members will review the packing list and the vouchers to ensure that all numbers are present and will then verify the receipt of all vouchers in the Management Information System (MIS).
  - 1.3.1. Both staff must complete the **Initial Receipt of Vouchers** section of the **Documentation of Voucher Inventory** form. See Appendix C for an example of how to document such an inventory.
  - 1.3.2. The completed form must be kept on file at the local program for a minimum of three years.
  - 1.3.3. A physical inventory of available vouchers must be completed again midseason by two staff members. Refer to Section 13.0 for more information.
- 1.4. Local staff are to report any missing vouchers in the sequence immediately to the state.
- 1.5. Farm Direct Coordinators are not to verify receipt in the MIS until staff can account for all vouchers.
- 1.6. The local program must distribute the voucher stock to the appropriate clinics in the MIS in order for the vouchers to be available to issue. Refer to <a href="TWIST">TWIST</a> Lesson 1000 Farmers' Market Coupon Issuance, Chapter 3, Section 10.

### **Eligible Recipients**

- 2.0 Each eligible individual will be issued seven \$4 vouchers (\$28 value). Vouchers will be called "**Farm Direct Dollars**" on public-facing materials. To be eligible, the individual must currently be receiving benefits under the WIC Program **and** belong to any of the following categories on the date of issuance:
  - Pregnant participant
  - Breastfeeding participant (including individuals who are doing some breastfeeding and not currently receiving a food package)
  - Postpartum non-breastfeeding participant
  - Infant at least 4 months of age
  - Children through the end of the month they turn five years old.
  - 2.1. The local program must confirm the eligibility status of all recipients *prior* to issuing Farm Direct vouchers. To do so, staff may use the "Voucher Eligibility Report" that is available in the MIS.

### **Benefit Package**

3.0 The state WIC program will determine a standard benefit package per eligible individual and per family each year.

3.1. Local programs may issue vouchers to no more than *the state's maximum number of Farm Direct-eligible individuals* per family unless otherwise notified by the state WIC Vendor Management Services Team Coordinator.

#### Foster Children

3.2. Eligible individuals who are foster children may each be considered a separate family according to local program policy.

#### **Distribution Dates**

- 4.0 Farm Direct vouchers may be distributed from May 1 until **no later than** September 30
  - 4.1. Local program staff may not issue vouchers to participants from another local program.

### **Participant Orientation**

- 5.0 All Farm Direct voucher recipients must receive an orientation to the program upon receipt of the vouchers for the first time in the current year. Refer to the participant Farm Direct Nutrition Program Brochure (57-1054) for required orientation elements which include:
  - 5.1. The purpose of the program
  - 5.2. How to use the Farm Direct vouchers
  - 5.3. The eligible foods
  - 5.4. The prohibition against cash change
  - 5.5. The participant's right to complain about improper practices and the process for making a complaint
  - 5.6. The location of authorized markets and farm stands; and
  - 5.7. Nutrition education that emphasizes the relationship of proper nutrition to the total concept of good health, including the importance of consuming fresh fruits and vegetables.

### Farm Direct Nutrition Education as WIC Quarterly Nutrition Education Contact

- 6.0 As appropriate, the nutrition education provided to Farm Direct voucher recipients may be counted as the participant's quarterly nutrition education contact for the program.
  - 6.1. Document that the participant has received nutrition education concerning fresh fruits and vegetables in the participant's record. See ♦ Policy 840—Document of Nutrition-Focused Education and Counseling.
    - Mailed nutrition education material cannot be used for the participant's quarterly nutrition education contact.

### **Issuing Vouchers**

7.0 Staff may issue Farm Direct vouchers either in-person or via the mail and must document voucher issuance in the MIS via the "Farmers' Market Issuance" screen as soon as possible.

- 7.1. Staff may distribute Farm Direct vouchers via in-person contact, including face-to-face and curbside-pickup.
  - 7.1.1. Prior to arranging for pick-up, staff must verify a participant's eligibility via use of a remote workstation or from a pre-printed eligible list that is generated from the MIS. Participants must show valid I.D. prior to issuance.
- 7.2. Staff may also mail Farm Direct vouchers to participants.
  - 7.2.1. The mailing must include material that meets the Participant Orientation requirements described above.
- 7.3. Staff must document voucher issuance in the MIS as soon as possible, preferable within 24 hours of distribution to participants. This will ensure accurate voucher reconciliation.
- 7.4. Staff may only issue vouchers that are assigned to their specific clinic.

### **Voucher Register**

- 8.0 The local program shall use the Farm Direct voucher register to capture the information necessary to document the issuance of Farm Direct vouchers in the MIS.
  - 8.1. Only one Farm Direct recipient can be documented per voucher range.
  - 8.2. See Appendix A for more information on completing the voucher register.
  - 8.3. The original Farm Direct voucher register must be kept on file at the local program for a minimum of three years.

### **Unissued Vouchers**

- 9.0 **Prior to September 30**, the local program may return unissued vouchers and the matching voucher registers to the state WIC office for reallocation.
  - 9.1. The State Farm Direct Coordinator may reallocate from one program to another any Farm Direct vouchers that have not yet been issued, after August 1
  - 9.2. If the program still has unissued vouchers after September 30, the vouchers must be voided in the "Farmers' Market Administration" screen in the MIS. The physical vouchers must be destroyed, and the voided ranges should be marked as "VOID" on the corresponding voucher register(s) by November 30.

### **Replacing Vouchers**

- 10.0 Farm Direct vouchers may be replaced under specific circumstances. See Appendix B for replacement voucher procedure.
  - 10.1. **Complete, unused** booklets of vouchers may be replaced under any of the following circumstances:
    - 10.1.1. Mailed but never received by the participant/cardholder.
    - 10.1.2. Destroyed in a natural disaster (e.g. fire, flood, earthquake).

- 10.1.3. Damaged beyond use (damaged booklets must be returned to the clinic, although a photo of the damaged booklet would also suffice).
- 10.1.4. Domestic violence situation where safety would be compromised if the participant/cardholder attempted to retrieve the booklet.
- 10.2. Lost or stolen Farm Direct vouchers will **not** be replaced. Void all vouchers reported as either lost or stolen in the MIS.

#### **Returned Vouchers**

11.0 Only **complete**, **unused** sets of issued Farm Direct vouchers that are returned by the participant for any reason may be re-issued to another participant. Incomplete sets of issued vouchers that are returned by the participant must be destroyed, the vouchers must be voided in the "Coupon Book Maintenance" screen in the MIS and the voided ranges should be marked as "VOID" on the corresponding voucher register(s).

### **Voucher Security**

- 12.0 Farm Direct vouchers must be kept under lock and key during non-clinic hours, breaks, and lunch hours. A staff person must attend unlocked vouchers at all times.
  - 12.1. Local programs are required to have a written procedure for ensuring voucher security that must be made available to state staff during program reviews.

### **Midseason Physical Inventory**

- 13.0 Since Farm Direct vouchers are pre-printed negotiable instruments, the local program must track all vouchers that are on-hand and those that have been distributed to clinic or satellite sites. At all times during the Farm Direct season local programs must be able to account for all vouchers that have been received from the state WIC program. Local programs should be able to account for all vouchers via the following:

  1) completed voucher registers, 2) physical vouchers available for issuance and 3) any tools used to track distribution of vouchers to satellite clinics or individual staff for issuance purposes.
  - 13.1. A physical inventory must be documented at least once during each Farm Direct season, after the start of the issuance period, at each site that stores vouchers. Use the **Midseason Physical Inventory** section (page 2) of the **Documentation of Voucher Inventory** form to do this. See Appendix C for an example of how to document such an inventory. The physical inventory must be completed by two staff members.
  - 13.2. Inventory documentation must be available to state staff during program reviews. This documentation must also be kept on file at the local program for a minimum of three years.
    - Inventory control duties (tracking and logging vouchers, physical inventory, etc.) must be split between at least two staff members. If this is not possible, the process must be verified by a second party to ensure that all aspects of voucher management are not within one person's control.

### **Civil Rights Complaints**

14.0 Civil rights complaints of discrimination on the basis of race, color, national origin, age, sex or disability will be handled according to Policy ◆588—Program Integrity: Complaints.

### Public Notification: Program Availability and Nondiscrimination Statement Signage

15.0 Information regarding program availability and USDA's nondiscrimination statement must be prominently displayed at all locations where Farm Direct vouchers are distributed and/or Farm Direct nutrition education takes place. This includes all out-of-clinic distribution sites. Please refer to ◆452—Civil Rights.

### Farm Direct Complaints/Abuse

16.0 All Farm Direct related complaints are to be handled according to Policy ♦588—Program Integrity: Complaints.

### **Monitoring Requirements**

- 17.0 Local programs that participate in the Farm Direct will be monitored for compliance every two years as required by federal rules. Reviews will cover the following:
  - Verification of Farm Direct recipient eligibility
  - Documentation of nutrition education in the participant's MIS record
  - Observation and/or documentation of voucher accountability procedures (Farm Direct voucher register); and
  - Observation and/or documentation of voucher security issues.
  - 17.1. For a copy of the Farm Direct review tool, visit <a href="https://www.oregon.gov/oha/ph/HealthyPeopleFamilies/wic/Pages/wiccoordinator.aspx">https://www.oregon.gov/oha/ph/HealthyPeopleFamilies/wic/Pages/wiccoordinator.aspx</a>

### **Allowable Administrative Expenses**

- 18.0 USDA considers allowable local agency expenditures to include costs associated with nutrition education, voucher issuance, and education about how to redeem the vouchers. Limit expenditures of annual Farm Direct ("WIC Farmers Market") minigrant to paying for the following administrative expenses:
  - staff salaries (e.g. voucher issuance, program promotion),
  - nutrition education materials.
  - costs associated with issuance, education, and/or farmer recruitment events, such as purchase/rental of tables or tents and travel expenses (e.g. gas, parking), and small incentive items, preferably branded with a nutrition message. Please refer to
    - ♦ 460—Program Incentives

If you need this in large print or an alternate format, please call 971-673-0040.

This institution is an equal opportunity provider.

### **POLICY HISTORY**

Date	* Revised, Reviewed, Released			
5/9/2008	Revised			
5/9/2011	Revised			
4/11/2013	Revised			
6/25/2014	Revised			
3/29/2018	Revised			
4/5/2019	Revised			
5/1/2019	Minor Revision			
6/23/2020	Major revision			
1/8/2021	Major revision			
4/2/2021	Minor revision (per FNS)			
3/30/2023	Major revision (benefit instrument)			
4/10/2024	Minor revision			

The date located at the top of the policy is the date of the most recent revision upload.

Release notes can be found in the corresponding document on the Policy and Procedure Manual page.

Minor Revisions: Minor edits, grammatical updates, clarifications, and/or formatting changes have occurred.

Date of Origin: Date policy was initially released

<sup>\*</sup>Major Revisions (used to be updated) Significant content changes made to policy.

#### **APPENDIX A**

### Instructions for Completing the Farm Direct Voucher Register

Both distrib	Requirements for completing the Farm Direct voucher register based on distribution method  Both distribution methods require these elements (1) date of distribution, (2) type of distribution method, (3) WIC ID number, (4) voucher range (pre-filled), (5) recipient name, and (6) staff initials							
(1)	(	2)	(3)	(4)		(5)	(6)	
DATE	Issued in	Issued by	WIC ID	Begin	End	Recipient Name	Staff	
	Person	Mail	number	Voucher #	Voucher #		Initials	
Example A	Example A – In-Person Distribution							
7/1/2023	<b>X</b>			1000416	1000422	Ann Smith	<b>91</b>	
Example B	Example B - Mail							
7/1/2023		X		1000416	1000422	Ann Smith (name required) 222 E. Willamette Bushwill, QR 99999	91	

### Requirements for completing the Farm Direct voucher register – multiple issuances per household

- **Date issued to the participant** every entry on each voucher register page must have either an issuance date or a line through it originating from another entry with an issuance date.
- **Line of continuation** when a line is used to document checks were issued on the same date. A line of continuation may not move from one page to the next, each page must start with a date.
- **Issuance method** a line of continuation may be used to show how multiple booklets were issued to a household.
- WIC ID# a unique participant WIC ID number must be captured for each booklet issued.
- Begin/End Voucher # these are pre-printed on the Farm Direct voucher register.
- **Recipient name** a line of continuation may be used to document that an individual is vouchers for multiple WIC participants.
- Staff Initials a line of continuation may be used for this requirement.

When completing multiple register pages on the same day, the first row of each register page must be completed in order to use lines of continuation.

DATE	Issued in	Issued by	WIC ID	Begin	End	Recipient Name	Staff	
	Person	Mail	number	Voucher #	Voucher #		Initials	
Example A	Example A – In-Person Distribution							
7/1/2023	X.		123456-01	1000416	1000422	Ann Smith	61	
			123456-02	1000423	1000429			
•	+		123456-03	1000430	1000436		<b>+</b>	
Example B - Mail								
7/1/2023		X.	123456-01	1000416	1000422	Ann Smith (name required)	61	
						222 E. Willamette		
						Bushwill, OR 99999		
			123456-02	1000423	1000429			
<b>+</b>		<b>\</b>	123456-03	1000430	1000436	<b>+</b>	<b>\</b>	

#### **APPENDIX B**

### **Replacement Voucher Procedure**

# **WIC Farm Direct Voucher Replacement Procedure**

- 1) Verify that the participant's vouchers may be replaced. Complete, unused booklets of vouchers may be replaced under any of the following circumstances:
  - a) Mailed but never received by the participant/cardholder.
  - b) Destroyed in a natural disaster (e.g. fire, flood, earthquake).
  - c) Damaged beyond use (damaged booklets must be returned to the clinic, although a photo of the damaged booklet would also suffice).
    - Domestic violence situation where safety would be compromised if the participant/cardholder attempted to retrieve the booklet.
- 2) Check the data system to see if there were vouchers issued to the participant.
  - a) If the vouchers were mailed, the participant should allow 30 days for the vouchers to arrive before contacting the WIC clinic.
- 3) If the data system shows the participant was issued vouchers, contact App Support to see if any of the vouchers in the booklet have been redeemed. If <u>any</u> of the vouchers have been redeemed, DO NOT issue a new booklet. If none of the vouchers have been redeemed, do the following:
  - a) Complete a <u>Farm Direct replacement affidavit</u> with your clinic's mailing address, participant's WIC ID, and the voucher booklet's beginning and ending numbers. Have the participant sign, date and return the affidavit to the clinic.
  - b) Upon receipt of the signed affidavit, ask State WIC App Support to "un-issue" the participant's vouchers so you may issue them a new booklet. (If the participant reports their booklet as damaged, you must receive the damaged booklet or a photo of it before you contact App Support, unless the participant lives in an area known to be affected by a natural disaster.)
  - c) Give the participant the following with the new booklet:
    - (1) State-provided cover letter explaining why they are receiving vouchers, in English and Spanish (if you are mailing the booklet)
    - (2) Farm Direct brochure providing the orientation to Farm Direct (English/Spanish)
    - (3) Self-paced activity providing the required Farm Direct fruit and veggie nutrition education (English/Spanish)
  - d) Note replacement voucher issuance on the corresponding voucher register page.
  - e) File any signed affidavits with the corresponding season's voucher register pages.

Please contact Maria Menor (<u>maria.i.menor@oha.oregon.gov</u>) or Mary Rhode (<u>mary.rhode@oha.oregon.gov</u>) with your questions.

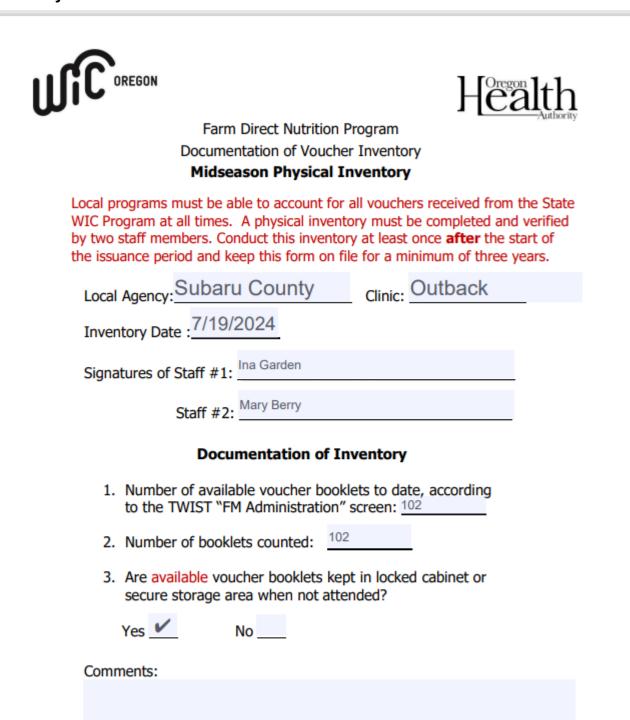
## **APPENDIX C**

# Sample Farm Direct Documentation of Voucher Inventory – Initial Receipt of Vouchers

USC OREGON Health
Farm Direct Nutrition Program  Documentation of Voucher Inventory  Initial Receipt of Vouchers
Local programs must verify the <b>initial receipt</b> of vouchers from the State WIC Program. Two staff members must conduct the verification. Keep this form on file for a minimum of three years.
Local Agency: Subaru County Clinic: Outback
Inventory Date: 5/5/2024
Signatures of Staff #1: Mary Berry
Staff #2: Ina Garden
Documentation of Inventory
<ol> <li>Number of vouchers sent from State WIC Program according to the TWIST "FM Administration" screen: (enter after verifying vouchers)</li> </ol>
3500
2. Number of vouchers received from State WIC Program: 3500
3. Are vouchers kept in locked cabinet or secure storage area when not attended?
Yes No
Comments:  Verified 500 booklets
57-1056-ENGL (05/2023)

### **APPENDIX C, continued**

Sample Farm Direct Documentation of Voucher Inventory Form – Midseason Physical Inventory



57-1056-ENGL (05/2023)